

R E M A R K S

1. Claims 1-40 are pending in this Application. Reconsideration and further prosecution of the above-identified application are respectfully requested in view of the discussion that follows.

Claims 1-40 have been rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,611,590 to Lu et al. in view of U.S. Pat. No. 6,304,653 to O'Neil et al. In response, independent claims 1, 16 and 31 have been further amended to more precisely clarify the invention.

In this regard, independent claims 1, 16 and 31 have been limited to the context where "said protocol stack of the agent and protocol stack of the client being disposed inside the private computer network". Support for the further limitation may be found in par. [0021] of the specification.

Independent claims 1, 16 and 31 have also been limited to the context where "wherein communication between the predetermined protocol stack of the agent and protocol stack of the client operates under a first protocol and communication between the protocol stack of the client and the client through the public communication network operates under a second protocol". Support for the further limitation may be found in

numerous location (e.g., pars. [0027], [0045], etc.) within the specification.

In contrast, Lu et al. is directed to an Internet Interface Controller (IIC) 170 that merely routes calls. In this regard, Lu et al. explicitly states that "upon receiving a CALL_US request, the IIC determines the agent and the call center best suited to service a particular call, considered Enterprise-wide, and initializes a call session between the caller 110 and the best suited call center 120" (Lu et al., col. 4, lines 55-59). As would be abundantly clear to those of skill in the art, the initialization of a call session is not the same as spawning a call application.

Similarly, while O'Neil et al. initiates calls, it doesn't "independently spawning a call processing application based upon the determined type of call and upon the selected agent with a first end of the independently spawned call processing application operatively coupled to a predetermined protocol stack of the selected agent and with a second end of the independently spawned call processing application operatively coupled to a protocol stack of the client, said independently spawned call processing application being operable to exchange information between the selected agent and the client, said protocol stack of the agent and protocol stack of the client being disposed inside the private computer network and wherein

communication between the predetermined protocol stack of the agent and protocol stack of the client operates under a first protocol and communication between the protocol stack of the client and the client through the public communication network operates under a second protocol". For VoIP calls, the O'Neil et al. system operates to "communicate directly with the user through the data network via voice telephony" (O'Neil et al., col. 7, lines 13-15). For PSTN calls, the O'Neil et al. system functions to "initiate a call to the user and initiate a second call to the call assistance device 400 to the telephone network interface 420, for example, and then bridge the two calls" (O'Neil et al, col. 9, lines 30-33). As such, O'Neil et al. operates under a single end-to-end protocol for either Internet or PSTN calls.

In addition, since O'Neil et al. operates under a single protocol, there wouldn't be "a protocol stack of the agent and protocol stack of the client . . . disposed within the private computer network". This is especially true since O'Neil et al. preserves the separate nature of data network voice telephony and switched circuit voice telephony.

Since the combination of Lu et al. and O'Neil et al. fail to provide any teaching regarding communication between agent and client stacks within a private computer network or the use of multiple protocols between the stacks and client, the

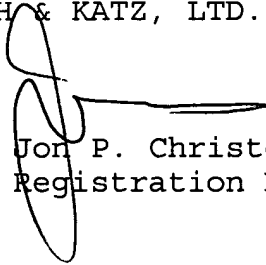
combination fails to teach or suggest each and every claim limitation. Since the combination fails to teach or suggest each and every claim limitation, the rejections are improper and should be withdrawn.

3. The allowance of claims 1-40 as now presented, is believed to be in order and such action is earnestly solicited. Should the Examiner be of the opinion that a telephone conference would expedite prosecution of the subject application, he is respectfully requested to telephone applicant's undersigned attorney.

Respectfully submitted,

WELSH & KATZ, LTD.

By


Jon P. Christensen
Registration No. 34,137

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WELSH & KATZ, LTD.
120 South Riverside Plaza
22nd Floor
Chicago, Illinois 60606
(312) 655-1500